

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

RowVaughn Wells,

Plaintiff,

v.

The City of Memphis *et al.*,

Defendants.

Case No. 2:23-CV-02224

**PLAINTIFF’S MOTION FOR LEAVE TO FILE REPLY BRIEF**

Pursuant to Local Rule 7.2(c), Plaintiff RowVaughn Wells, through her undersigned counsel, hereby moves for leave to file a reply in support of her Motion to Amend the Scheduling Order (ECF 447). Plaintiff’s proposed reply brief is attached as **Exhibit A**. The City Defendants object. In support of this motion, Plaintiff states as follows.

Plaintiff seeks leave to file a reply brief in order to address the arguments raised in the City Defendants’ opposition brief. ECF 455 (“Resp.”). A reply is warranted here because Plaintiff’s motion (and the City Defendants’ response) involve multiple discovery and case management issues that are pivotal to this litigation and to ensuring that it proceeds fairly toward trial. As explained in Plaintiff’s motion and in her request for a hearing (ECF 451), this is not a routine request for more time. Rather, it will determine whether Plaintiff has the ability to gather evidence that is central to her claims and that remains outstanding through no fault of her own. Given the stakes of this matter, it is especially important that the Court have a full understanding of the arguments on both sides, which is what Plaintiff’s proposed reply provides.

In particular, the proposed reply would aid the Court in adjudicating the scheduling motion because so much of what underlies the requested extension of discovery involves detailed

case history, including the parties' conduct before this Court's recent assignment to this case. Many of the arguments in the City Defendants' opposition brief involve the parties' prior dealings in discovery, and the Court's adjudication will benefit from hearing Plaintiff's response on these points. In short, Plaintiff's proposed reply brief will assist the Court in deciding this consequential matter.

WHEREFORE, for the reasons stated above, Plaintiff respectfully requests that the Court grant her leave to file her reply in support of her Motion to Amend the Scheduling Order, attached as Exhibit A.

Dated: July 18, 2025

Respectfully submitted,

/s/ Joshua M. Levin

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**CERTIFICATE OF CONSULTATION**

On July 18, 2025, Plaintiff conferred via e-mail with all Defendants regarding the relief requested in this motion. Defendants City of Memphis and Chief Cerelyn J. Davis responded that they object. The remaining defendants have not responded as of this filing.

/s/ Joshua M. Levin